

- Map 1. This land status map should incorporate the 1984 mapping effort of the USGS (Water Resources Investigations 84-4001, unnumbered plate).
- 15-9 There should be a map indicating water resource availability (water contours, depth to water, and so forth; see USGS maps referenced above).  
There should be a map indicating population distribution, as in Plate 9 (cited above).
- 15-10 Map 2. The proposed Vineyard Creek ACEC (sub L-6) is not indicated on the Map, although the site is designated by the purple color.
- 15-11 Map 7. It is extremely misleading to only present Shoshone sculpin in BLM localities (Box Canyon; Blueheart Springs should also be indicated). The entire distribution should be mapped, as it appears in Figures 1 and 2 of Wallace and Griffith (1982). Omitted from this map are the distributions of the Bliss Rapids Snail, Snake River Physa Snail, Utah Valvata Snail, and all plants. The distributions (which are extremely limited) of all of these species should be indicated. A similar map for plants and plant communities (rare, threatened or endangered) should be constructed.
- 15-12 Map 8. All proposed or designated National Natural Landmarks should appear on this Map. Omitted are Niagara Springs (a designated NNL), the Wiley Reach of the Snake River, and Malad Canyon. The Wiley Reach and Lower Malad Canyon should also be cited on this map as one of the Important Fish and Wildlife Habitat sites determined by the USFWS (Boccard, 1980).
- 15-13 Map 13. The Wiley Reach of the Snake River should be marked in blue as a "high quality whitewater" site. This site should also be labeled as having been identified as a promising Wild and Scenic River (recreational river) reach in the National Rivers Inventory.
- 15-14 Map 11. High quality riparian habitat and "average" riparian vegetation should be designated on this otherwise forage fixated habitat map. Lower Malad Canyon and the Wiley Reach (see USFWS, 1980) should be indicated as high quality riparian habitat.
- 15-15 It would be extremely useful to have a map indicating projected maximum ecological condition/mitigation habitat potential (as in Alt. D sub "no grazing") for the Monument region. This map could indicate areas which would be suitable for re-introduction of native species (bighorn sheep, antelope), expansion of natural community types were seeding and spraying terminated, and expansion of rare, threatened, and endangered plants, animals and plant communities.
- 15-16 Vineyard Creek ACEC. On page 1-21 "a unique species of hybrid trout" should be changed to "a unique hybrid trout population". As you know, I strongly recommend ACEC designation for the entire Natural Landmark (Dry Cataract), rather than the scaled down ACEC BLM proposes.

I strongly support Alternative D, which comes the closest to addressing sustained yield, other ecological concerns, and true multiple uses which are in the broader public as opposed to special interest. Many of the ideas you develop in this alternative are basically good, although my preference is that discussed in my letter of May 30, 1983, which I have attached for the record. All six WSAs should be recommended as suitable for wilderness designation; I am opposed to the diminution of the public domain and this alternative reduces transfer to a reasonable level (40% of the current No Action plan; Alt. 8 would be an increase of 890% above Alt. A); all 126 isolated tracts should be retained for wildlife habitat values; BLM should never give up land which is important as public access; BLM should calculate what stocking rate would comply with sustained yield, and 15.3 acres per AUM comes much closer than any of the other alternatives; brush control and seeding should be greatly restricted, if not terminated (native species only should be used for seeding); I disagree with many of the proposed "range improvements" and would like to see AUM generated money put into wildlife mitigation measures; ORV use should be severely curtailed into carefully designed use areas to protect soil, habitat, and wildlife on public lands. It seems probable that alternatives B and C would not survive court challenge on a number of grounds, but primarily because they do not comply with FLPMA sustained yield criteria (as well as balanced multiple use mandates) or reflect a legally adequate range of legally possible alternatives. A group of alternatives which would more accurately reflect the legal range of alternatives might be No Action (but designating a reasonable AUM allocation to wildlife), a 10% reduction in livestock AUM allocations, a 20% reduction in livestock AUM apportionment, and a maximum preservation/ecological mitigation alternative. Proposing two alternatives which violate sustained yield and which would involve massive ecological manipulation away from naturalness is a very likely a violation of NEPA and the FLPMA, but doesn't really make good longitudinal management sense in any event.

I have attached a number of letters and papers I ask be included in the record. Among these are my comments on the kind of issues you present in the beginning of this DEIS, which, rather than restate, I am just forwarding as I addressed them previously. In view of Coggins interpretations of public rangeland management law, it seems clear that many of these are merely tantalizing special interest users of the public domain into a false impression that their input in their selfinterest can validate uses which are excluded by a balanced multiple use mandate and sustained yield management plan. BLM should be following its mandate which means reducing grazing allocations and being true public interest stewards. Rather than design ways to increase consumptive use by exacerbating ecologic disturbance, I urge keeping naturalness your goal. Please include this letter and the attachments in the RMP record. Thank you for your consideration and this opportunity to make comment.

Sincerely,

*Peter A. Bowler*  
Peter A. Bowler

Permanent address:	Summer address:	Professional affiliation:
560 St. Anns	Star Route	Dept. of Ecology and
Laguna Beach, CA	Bliss, Idaho	Evolutionary Biology
92651	84413	University of California
		Irvine, CA 92717

-5-

-6-

The following references should be consulted and cited in the final EIS:

- Bowler, P.A. 1981. Natural History Studies and an Evaluation of Eligibility of Malad Canyon for National Natural Landmark Designation. Open file report for the Heritage Conservation and Recreation Service.
- Bowler, P.A. 1981. Natural History Studies and an Evaluation for Eligibility of the Wiley Reach of the Snake River for National Natural Landmark Designation. Open file report for the Heritage Conservation and Recreation Service.
- Wallace, R.L. and J.S. Griffith. 1982. Distribution, Relative Abundance, Life History and Habitat Preferences of Shoshone Sculpin. Final Report to U.S. Fish and Wildlife Service, Boise, Idaho.
- Ferguson, D. and N. Ferguson. 1983. Sacred Cows at the Public Trough. Maverick Publications, Bend, Oregon.
- Taylor, D.W. July 1, 1982. Status Report on Bliss Rapids Snail. Submitted to the U.S. Fish and Wildlife Service, Boise Office.
- Taylor, D.W. July 1, 1982. Status Report on Giant Columbia River Limpet in Southwestern Idaho. Submitted to the U.S. Fish and Wildlife Service, Boise Office.
- Taylor, D.W. July 1, 1982. Status Report on Snake River Physa Snail. Submitted to the U.S. Fish and Wildlife Service, Boise, Idaho.
- Taylor, D.W. May 10, 1982. Status Report on Homedale Creek Snail. Submitted to the U.S. Fish and Wildlife Service, Boise, Idaho.
- Taylor, D.W. August 13, 1982. Status Report on the Utah Valvata Snail. Submitted to the U.S. Fish and Wildlife Service, Boise, Idaho.
- Federal Energy Regulatory Commission. March, 1984. Eagle Rock Project, FERC Project No. 2789. Final Environmental Impact Statement.
- Federal Energy Regulatory Commission. September, 1982. A.J. Wiley Project, FERC Project No. 2845. Final Environmental Impact Statement.
- U.S. Fish and Wildlife Service. 1980. Review of the status of the Bliss Rapids Snail and the Snake River Physa Snail. Federal Register 45 (80): 27723.
- Boccard, B. 1980. Important fish and wildlife habitats of Idaho; an inventory. U.S. Fish and Wildlife Service.
- Lindholm, G.F., S.P. Garabedian, G.D. Newton, and R.L. Whitehead. 1983. Configuration of the Water Table, March 1980, in the Snake River Plain Regional Aquifer System, Idaho and Eastern Oregon. Open File Report 82-1022. U.S. Geological Survey. Denver Office.
- University of California, Irvine. 1980. Studies of Water Use on the Snake River Drainage, Southern Idaho. Research Reports on the A.J. Wiley Reach. Sponsored by National Science Foundation Grant No. SPI-7905344. (Eleven research papers)
- Munning, H. and P. O'Hara. 1984. Washington Wilderness: The Unfinished Work. Mountaineers, Seattle, WA.

- Coggins, G.C., P.B. Evans, and Margaret Lindberg-Johnson. 1982. The Law of Public Rangeland Management I: The Extent and Distribution of Federal Power. Environmental Law 12: 534-621.
- Coggins, G.C. and M. Lindeberg-Johnson. 1982. The Law of Public Rangeland Management II: The Commons and the Taylor Act. Environmental Law 13: 1-101.
- Coggins, G.C. 1983. The Law of Public Rangeland Management III: A Survey of Creeping Regulation at the Periphery, 1934-1982. Environmental Law 13: 295-365.
- Coggins, G.C. 1983. The Law of Public Rangeland Management IV: FLPMA, PRIA, and the Multiple Use Mandate. Environmental Law 14: 1-132.
- Coggins, G.C. 1984. The Law of Public Rangeland Management V: Prescriptions for Reform. Environmental Law 14: 497-546.
- Heritage Conservation and Recreation Service. 1980. Nationwide Rivers Inventory: A Report on Natural and Free-flowing Rivers in the Northwestern United States. Northwest Region. Seattle, Washington. (The Final Inventory was published by the National Park Service.)

- 15-1 Potential designation of the Snake River Plain Aquifer as a sole source aquifer has no effect on proposals in the RMP and proposals in the RMP do not have any effect on the potential designation. Therefore, the issue is not discussed in the EIS.

The effect of removal of water from the aquifer to irrigate newly developed farmland on hydroelectric generation is discussed under "Economic Conditions" in Chapter 4 for each alternative. Any individual proposals that may impact the aquifer will be considered through the NEPA processes.

- 15-2 The areas mentioned have not been cited in the Draft EIS because they contain no public land in the Monument Planning Area. The existence of these areas has no effect on proposed actions in the RMP and any of the proposed actions will not have any effect on the subject proposed National Natural Landmarks.

- 15-3 Actions proposed in the RMP would have no effect on habitat in these areas. There is no public land in the Monument Planning Area in either area, so BLM has no control over management there.

- 15-4 Although qualifying for inclusion on the Nationwide Rivers Inventory, there is no public land adjacent to the river within the Monument Planning Area. Actions proposed in the RMP would have no effect on this portion of the river or recreational use of it. For this reason, the Wiley Reach of the Snake River has not been included on the map or in the narrative as a significant recreation resource.

- 15-5 Although these studies may be of interest to some readers of the RMP, they do not expand on identified planning issues and information from the studies was not used in this EIS. Therefore, they are not cited.

- 15-6 Of all these species, only the Bliss Rapids Snail may occur in waters adjacent to BLM-administered land. Most are only in the Snake River and the actions proposed in the RMP would not affect them.

We agree that we should cite the status review of the Bliss Rapids Snail as we do include this species in the RMP. It is referenced in the final RMP/EIS.

The desert night snake has no special status. There is no difference among alternatives in how this species would be managed. No impacts on this species are predicted for any of the alternatives.

- 15-13 See response to comment 15-3.

- 15-14 See response to comment 15-4.

- 15-15 Riparian habitat entered into the planning mainly in the consideration of Isolated Tracts (page C-4). The physically small areas of riparian habitat would be difficult to map on such a small scale. The areas are described on page 3-8 of the final EIS.

There is no public land in the Monument Planning Area in either area. See response to comment 15-3.

- 15-16 Such a map would be interesting from a historical perspective, but has not been prepared. A map showing the projected improvement in ecological condition would look very similar to the existing ecological condition map (Map 10) because only a small improvement in ecological condition is expected in the 20 years projected by this document.

A map could be prepared for plant communities that once occupied the area, but the possibility of these communities re-establishing over the same area, even far into the future, is very slim. The abundance of cheatgrass in the planning area and the cheatgrass/fire interrelationship described on pages 3-2, 3-3, 3-12, and B-1 - B-3 in the draft EIS are pervasive influences that prevent attainment of higher ecological condition. Re-establishment of the natural vegetation in the time frame covered by this document is simply not feasible. "Alternatives Eliminated From Consideration" in Chapter 2 has been expanded in the final EIS and includes a discussion on re-establishing natural plant communities in the planning area.

Such a map would be difficult to prepare for animals. Although we know that some large animal species such as pumas, grizzlies, and buffalo once lived in the planning area, we do not know their exact range and what their requirements were. We don't know about the past occurrence of many other smaller species such as the desert night snake. Re-introduction of some of these native animal species would be futile because of factors that we do not have complete control over, e.g., disturbance by people and livestock, ORV use, trains, and loss of historic habitat to agriculture, urbanization, and cheatgrass.

Rare and threatened and endangered species distribution is controlled by various factors. The range of arching pussytoes communities is limited by the lack of suitable meadow habitat in this area. Most sandy sites in the planning area between 3,700 and 5,000 elevation are potential habitat for the Picabo milkvetch. It appears that the Picabo milkvetch may be a seral species, since more plants have been found on highly disturbed sites than in better condition areas. For some species, such as the desert night snake, we don't know enough about their habitat requirements at this time to increase populations.

The most recent publication of the Rare and Endangered Plants Technical Committee was consulted and is now cited on page 3-13 of the final EIS. Additional information concerning proposed threatened and endangered plants has also been added to the text. This includes information about the Picabo milkvetch obtained in 1984.

- 15-7 The effects of actions proposed in each alternative on threatened and endangered plants are shown in the text of Chapter 4 at the end of each section titled "Vegetation." A brief discussion has been added to Table 2-3 under "Vegetation" to show effects in a comparative format.

- 15-8 AUM "allocations" for wildlife were not presented because AUMs are not limiting. This reasoning is treated on pages 3-3 and 3-4 in the draft RMP/EIS.

The impacts of grazing pressure on plant and animal species diversity will not vary appreciably among alternatives because grazing is already below capacity and other factors (pages 8-3 and 3-4 in the draft RMP/EIS) are much more important. A decrease in grazing would result in more frequent large fires, greater cheatgrass domination, and lower species diversity (pages 4-53, 4-54, and 4-55).

Range improvements would increase species diversity in cheatgrass zones and buffer sagebrush patches from wildfire, thus increasing long-term diversity. Seeding with introduced species that can out-compete cheatgrass is therefore desirable.

Naturalness has already been severely affected by introduced species. In this RMP, we propose to slow or halt even further loss of naturalness, mainly as a result of wildfire. The public domain will become less disturbed with better livestock and fire management.

Our efforts would improve species diversity by range improvements and wildfire control as stated above.

- 15-9 See response to comment 15-1. A map showing the population distribution would not add to the analysis in the EIS.

- 15-10 The Vineyard Creek ACEC is not proposed in Alternative A and therefore is not shown on Map 2. The legends for Maps 2 through 5 include all multiple use and transfer designations even though they are not all included in any single alternative.

- 15-11 We have shown the distributions of these species where actions proposed in the RMP would affect their habitat. See response to comment 15-6.

- 15-12 See response to Comment 15-2.

- 15-17 The text has been changed (page 52 in the proposed Monument RMP).

- 15-18 Alternatives B and C are a part of the range of alternatives considered in detail for the EIS. This range of alternatives includes no action, higher livestock stocking, lower livestock stocking, and no livestock grazing. A maximum preservation/ecological mitigation alternative was considered but not developed for analysis in the EIS. The discussion of "Alternatives Eliminated From Consideration" in Chapter 2 has been expanded for the final EIS, beginning on page 2-11.

UNITED FOUR WHEEL  
DRIVE ASSOCIATIONS

of U.S. and CANADA

8900 N. Camino de Anza Tucson, AZ 85704

Mr. Ervin Cowley, Project Manager  
Shoshone District - Bureau of Land Management  
P.O. Box 2 B  
Shoshone, ID 83352

July 10, 1984

July 11, 1984

RE: Monument Resource Management Plan/EIS

Dear Mr. Cowley:

Thank you for sending a copy of your proposed management plan and the opportunity to comment. After having reviewed your draft management plan and EIS I have several comments that I'd like to make. First and foremost I take exception with your negative connotations throughout the plan relating to the adverse effects of ORV's. You constantly refer to ORV's "adversely effecting" "wilderness" characteristics. "should ORV's be allowed to use erosion susceptible areas", and "non-designation of areas to wilderness will result in losses for the foreseeable future". This to me shows a strong bias on your management towards wilderness. This is "public" land that you are managing, and should be managed for multiple-use for the public benefit. The entire public, not just a select minority.

You also refer to the designation of an "area of critical environmental concern" based on the personal communication of two (2) professors. Is this all that you require to close off a large segment of "public" lands? If so I could get several professors to exclaim the multiple values of ORV use on every square inch of "public" lands. You also refer to "100 miles of roads" to maintain - "to grade the vegetation for fire control". Why not use volunteer recreational 4-wheelers to help maintain these "roads".

You go on to indicate that of the 1,178,989 acres of this management area only 90,103 acres are "closed" to ORV's, that 825,554 acres of "open" to "moderate" ORV use, with limited use on 296,857 acres. This sounds all fine and dandy, that you have accommodated recreational ORV use. But, in reality where are the trails? You should have recognized that some very good 4WD trails bisect your proposed 17-1 "moderate" 2 in. "open" 3 in. "open" 1 in. Sand Butte. The presence of these 4WD trails (irregardless of whether they meet the definition of a "road") should have clearly precluded these areas from being WSA's. It's not that we are opposed to "wilderness" it's just that we can't afford to lose any more 4WD trails. We don't ask that new areas be "roaded" and opened to ORV use, just that areas with existing good 4WD trails be left open to multiple-use and recreational 4WD access.

I believe that more serious concern needs to be shown to recreational 4WD use in your management plan. You have severely neglected this aspect of recreation in your proposed draft plan. This clearly illustrates either a total lack of understanding, or a significant bias to other uses of the public lands. Let me remind you that recreational ORV's far outnumber the wilderness recreationists. In that respect public lands are to be managed for the greatest good for the greatest number within the limits of the land and its resources.

Thank you for this opportunity to comment. I do hope that you will respond accordingly. The recreational 4WD user's of the public lands stand ready at any time to cooperate with you and do whatever is needed to protect and enhance our natural resources.

*Stu Baugman*  
RESPECT...PROTECT...AND ENJOY: LAND, WATER, MOUNTAINS, AND SUN RESOURCES

Sincerely,

*Anton Newman*  
Anton Newman  
859 Eisenhower  
American Falls, ID 83211

Ervin Cowley  
Project Manager  
B.L.M.  
P.O.Box 2B  
Shoshone, Id 83352

Dear Mr. Cowley,

I have a Desert Land Entry, Number I-13049, in the Monument Planning Area. I attended the hearing in Shoshone recently, but had no prepared statement. I would like to express my thoughts in this letter.

I favor alternative C in the RMP/EIS. I would like to go ahead with development and I feel that such an isolated parcel is probably difficult for the B.L.M. to manage.

I think development is feasible because ground water is relatively shallow in that area and I have a valid water permit. As it stands now, I can also get electricity to it.

I would appreciate your consideration in this matter when you choose your final plan.

Response to Letter Number 17

17-1 A review of our inventory data shows two ways bisecting Raven's Eye WSA, but none bisecting Sand Butte WSA. The ways in Raven's Eye WSA are mentioned on page F-27 in the draft RMP/EIS in paragraphs 3 and 4. We realize that closure of these ways would affect ORV use somewhat as is reflected in the projected 1 percent decline in growth of recreational ORV use under Alternative C on page 4-38 of the draft RMP/EIS.

## Cavanaugh and Beebe

BEN CAVANESS  
MARK BEEBE

ATTORNEYS-AT-LAW  
P.O. Box 70  
American Falls, Idaho 83211

Telephone  
(208) 226-2562

July 23, 1984

Letter Number 18

Mr. Ervin Cowley  
Project Manager  
Bureau of Land Management  
P.O. Box 2 B  
Shoshone, Idaho 83352

Re: Written Comment - Monument Resource Management Plan &amp; EIS

Dear Mr. Cowley:

I have read and studied the monument area resource management plan and EIS with a particular interest in your opinions and conclusions as to the planning and use of land in the Lake Channel - Wapi areas where I have a personal interest. The only objections or comments that I have with regard to the adequacy of the planning documents and environmental impact conclusions relate to your gross overstatements of the erosion potential of the soils in that area. As a landowner in that area on identical soils I have very little difficulty controlling wind erosion and feel that your conclusions in this regard are predicated more on a desire to maintain a quality crested wheat seeding covering the area in federal control than on a real fear as to the erosion potential of the area. Mr. Vern Duffin is farming in the middle of the area that you consider to have severe erosion potential and he has experienced none of the wind erosion that you conclude will be experienced. I would strongly suggest that you make your final conclusions in this area not based on a cursory review of some general soil classification maps but upon detailed on the ground studies and production records of Mr. Vern Duffin and myself, along with others in the area who have actually farmed this so called erodible soil so that your conclusions in this regard will be based upon actual conditions rather than personal conjecture and inaccurate and incomplete data.

I support your Alternative B planning objective. I feel that it most closely reflects the actual on the ground potential of the planning area and would serve the best short and long range plans of all users, both public and private.

The only other comment that I would like to make is since that my "reading between the lines" and prior experience with government agencies leads me to believe that you will adopt Alternative C, I feel that you should add an additional classification of land allowing transfer of other lands in that alternative. In Alternative C you classify the public land in the Lake Channel and Wapi areas that would be Class 1 soil except for its alleged erodability characteristic for public uses only in perpetuity with no chance for transfer or exchange. I am personally aware of your desire to increase your holdings of riparian lands and valuable wildlife habitat areas presently in private ownership. If you forever "lock up" these areas against transfers or exchanges you will lock yourself out of the opportunity to make exchanges in the public interest in these areas,

Mr. Ervin Cowley  
Page -2-  
July 23, 1984

unless you would go through plan amendments which could be subject to legal challenge similar to those faced in court pertaining to "spot zoning". It would be much easier now to add the flexibility that is required with no additional work and leave the option as to the final use of this land in your hands. If this flexibility is not provided in this plan I see continued legal challenges being made against you in this regard.

A plan such as this is meant to be a long range plan, not a short range plan, and should provide where needed the flexibility that you the managers require to make further exchanges or transfers that you feel are in the public interest.

I would appreciate being kept posted as to further decisions made in this area and would be glad to provide any further information or documentation that you feel is required.

Very truly yours,

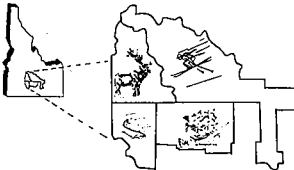
*Ben Cavaness*  
Ben Cavaness

BC:nh

18-1 Based on the soil surveys for the area and the National Soils Handbook (USDA, Soil Conservation Service, pp. 603-37) these soils do have a high erosion potential. However, under good farming practices and conservation measures, the potentially high levels of erosion may not occur.

**WOOD RIVER**  
RESOURCE CONSERVATION AND DEVELOPMENT AREA  
BLAINE-CAMAS-GOODING-LINCOLN Counties, Idaho

Letter Number 19



131 3rd Avenue East  
Gooding, Idaho 83330  
(208) 934-4149

Thank you for the opportunity to comment on the Monument EIS. If you have any questions as to our letter, please call.

Sincerely,

*Everett Ward*  
Everett 'Buck' Ward  
Chairman

July 26, 1984

Ervin Cowley  
Project Manager  
Bureau of Land Management  
P. O. Box 2B  
Shoshone, ID. 83352

Dear Mr. Cowley:

We would like to go on record as endorsing the Alternative C for the management of the Monument Resource Area.

There are three items on which we are making comments, which we feel will make the EIS better.

19-1 There is very little in the EIS which addresses noxious weeds. We believe the EIS should address the kinds, amounts, and what effects they are having on public lands and the adjacent private lands. We also would like to see a more detailed explanation as to how these infestations will be controlled than is given in the draft. If you would like assistance in developing this section, we could help you locate information or people who could assist you.

We recommend that land being sold which anyone is depending upon for their livelihood gets first chance to purchase it or an opportunity to meet the highest bid.

We have had some reports that in other sales of Federal land the appraised value of many land parcels exceeded that of local sales for the same type of land. We hope the appraisals of land in the Monument area will conform more closely with land sales of similar nature in the same location.

P. O. Box 158  
Ketchum, Idaho 83

[illegible]

RE: MONUMENT WSA

Dear Mr. Haszler:

As frequent visitors of the above area, may we express our views and recommendations?

It would be most desirable to preserve Raven's Eye and Sand Butte. We are opposed to possible pipelines to provide water for grazing cattle. There are a number of deer and antelope herds whose grazing winter areas should be preserved as these animals rarely adapt to new locations if forced to move.

Thank you for your attention.

Sincerely,

2:10:00

Hildegard and Tony Raeburn

Response to Letter Number 21

Mr. Charles J. Haszler  
District Manager  
Shoshone District SLM  
P.O.Box 2  
Shoshone, ID 83352

Dear Mr Naszier:

Concern for wildlife in the Monument resource Area is hereby expressed. Since this area is described as an ecological disaster, it is my belief that more preservation of wild grasslands and wildlife are needed.

- 21-1 I request an analysis of historic soil erosion rates, soil replenishment rates, soil erosion tolerance levels, and a vastly expanded irreversible and irretrievable resource losses section on soils. We cannot afford to loose more soil.

- 21-2 I request monitoring trigger levels on mule deer and antelope be changed to 15 percent (or less) declines in summer or winter range count. I firmly insist that no deer or antelope winter range land be sold. I request the BLM use range improvement funds to create and replace the winter range and summer habitat which fire and agriculture have removed.

I ask that analysis of grazing and nongrazing costs and benefits be kept separate. I request the BLM to explain why all its grazing permittees are regarded to be in good economic conditions at present.

I oppose any pipelines or range improvements anywhere in Laidlaw Park.  
I oppose any increase in grazing in any historically ungrazed or under-  
grazed rangeland.

I agree with the BLM's analysis of Desert Land Entry or Carey Act that wildlife and natural values outweigh the benefits of any land sales. I oppose any land sales.

I support wilderness for the five WSAs: Raven's Eye, Sand Butte, Bear Den Butte, Shale Butte and Little Eye. Wilderness and wildlife are treasures far beyond monetary values. Let us protect, preserve and enjoy them.

Sincerely yours,

Ruth Harrington

Ruth K. Herrington

- 21-1 The soils portions of the EIS have been expanded for the final.

- 21-2 Because of the low density of mule deer and pronghorn in the area in summer, it is difficult to get an accurate count. A change of up to 15 percent could easily be due to random sampling error. Levels of 30 percent for pronghorn and 50 percent for mule deer are levels that will reveal true population changes.

For winter range, we can reduce the levels from 30 percent to 15 percent. Again, it is a matter of trying to separate true population changes from sampling error, but counts of big game are more accurate in winter. This change has been made in the monitoring plan on page A-2 of the final RYS.



DANIEL A. POOLE  
President  
L. R. JAHN  
Vice-President  
L. L. WILLIAMSON  
Secretary  
WESLEY M. DIXON, Jr.  
Board Chairman

## Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

July 30, 1984

Mr. Ervin Cowley, Project Manager  
Bureau of Land Management  
P.O. Box 2 B  
Shoshone, Idaho 83352

Dear Sir:

The Wildlife Management Institute is pleased to comment on MONUMENT RESOURCE MANAGEMENT PLAN, ENVIRONMENTAL IMPACT STATEMENT, DRAFT, Idaho.

We prefer Alternative D, featuring preservation over the preferred Alternative C. Alternative D especially recognizes the unique wildlife habitats of the Snake River Plains and adjoining areas, with unique mixes of native and agricultural lands.

The loss of five isolated tracts in the preferred alternative is not acceptable (page 4-28). This successful pheasant habitat program is not duplicated outside Idaho, and it warrants expansion, not reduction. Alternative D provides maximum wilderness. We favor that action.

22-1 The monitoring plan is good as far as it goes. However, only a footnote describes who will do it. Idaho Fish and Game Department has a vital interest in monitoring wildlife and habitat. That agency should be an active participant in the program, beyond supplying pheasant and big game census data.

The total monitoring costs are not shown in appendix A. We added them and conclude that the \$37,190 total is extremely modest for the key operation in land management. We suggest the monitoring program be reviewed and strengthened where needed. The estimated costs should be carefully scrutinized, with sufficient funds budgeted to do the essential work.

The Alternative C (preferred) costs of range development are \$1,607,900. This is a heavy subsidy to the livestock permittees. The 20 year increase in forage from the 5-year licensed use average is 46,884 AUM, or a calculated cost of \$34.30 per AUM. The \$1.37 grazing fee will not pay the annual interest on the development costs.

DEDICATED TO WILDLIFE SINCE 1911

### Response to Letter Number 22

- 22-1 Idaho Department of Fish and Game is primarily involved in monitoring game numbers and regulating harvest. They are the best source of this information. BLM, on the other hand, concentrates on monitoring habitat. This is a reasonable way to share wildlife management, and we do meet regularly to ensure that our studies mesh where critical resources are involved.
- 22-2 Both active preference and average actual use are real measures of livestock use, so both are used to describe increases or decreases in livestock use in most places in the EIS. The five-year average actual use is a measure of the recent (five year) past grazing use and reflects the recent decline in the sheep industry more than the grazing use since adjudication. Active preference was established by adjudication in the late 1950s and early 1960s as the grazing capacity and resulted in an overall reduction in grazing use. Grazing use was at or near active preference after adjudication and has gradually declined to the present levels. Active preference is based on a real estimation of grazing capacity, not a depressed market, and is therefore used as the base for establishing grazing levels in Alternatives B, C, and D.
- 22-3 Tables 2-1, 2-2, and 2-3 are intended to serve as quick reference tables. A summary table has been added to the summary at the beginning of the final EIS.

Letter Number 22

Mr. Ervin Cowley

-2-

July 30, 1984

We assume the developments will be done on "Improvement Allotments". We counted those allotments in Table D-1 and counted the number of permittees on those "I" allotments in Table D-3. There are 20 allotments and 98 permittees. The average subsidy for each permittee calculates to \$16,407. If the development work were applied uniformly for all 186 permittees, the subsidy would be \$8,645 each. Either way is too much for the taxpayers in an age of record deficits. Grazing fees should be set so the government recovers the cost and interest on developments.

22-2 Much of the increase and decrease in livestock use discussed is based on active preference. This is misleading and the much lower 5-year licensed use should be used to show increases and decreases. For example, the preferred alternative shows a real increase of 48 percent, not a decrease of 3 percent. That is shown correctly on page 4-30, but is confusing in many other places.

22-3 A table showing comparative numerical data on the alternatives and their impacts should be added for quick reference.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

*Daniel A. Poole*  
Daniel A. Poole  
President

DAP:mmm

Letter Number 23

P.O. Box 8787  
Moscow, ID 83843  
31 July 1984

Dear Mr. Haszler:

I have examined several resource management plans over the past year and have not yet seen one even remotely as bad as the Monument RMP just released. It is so badly biased in favor of just one use--subsidized grazing--as to make a mockery of BLM's commitment to multiple-use. This is all the more tragic in light of the dismal condition of the public's range in the monument area.

The worst single feature of your plan is the unwise and wholly uneconomic scheme to build a stock pipeline to Laidlaw Park. Not only does this area have very high natural and recreational values, it is also one of the very few places in the Monument RMP that have not been badly overgrazed in the past. Your wildlife section also panders senselessly to the cowboys. The trigger levels to aid wildlife are far too low. By the time things get that bad for deer and antelope, nothing will be left of those populations to save. The same can be said of recreation planning for the RMP, virtually all of which gets put off into some nonexistent date in the future. If ever there was a part of Idaho that needs more public recreation facilities, it is this one. Instead, the grateful taxpayers get to build more cattle facilities. This is multiple-use?

23-1 The economic analysis is totally deficient. By merging all costs and benefits, it is not possible to see if the nation's huge investments on behalf of the grazers make economic sense. Since I know that they as a class would not want to be on the welfare dole for government subsidized handouts, a sound economic analysis that separates various costs and benefits would be of use to everyone.

I can only support Alt. D, although even that does a poor job. Of especial value are all five small Wilderness Study Areas, each of which needs to be recommended for wilderness. Because of its stream side values and good soils, the Raven's Eye is by far the best of these WSA's, but all are of great wildlife value due to the great scarcity of such land in the Carey area.

Sincerely,

*Dennis W. Baird*  
Dennis W. Baird

Response to Letter Number 23

- 23-1 Table J-3 identifies the economic impacts by type (grazing-related, recreation-related, crop agriculture-related, land transfer, and fire suppression). No further detail is available. The table differentiates between grazing-related and other, costs and impacts.

Letter Number 24

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101



REPLY TO  
ATTN: M/S 443

AUG 1 1984

Ervin Cowley, Project Manager  
Bureau of Land Management  
P.O. Box 28  
Shoshone, Idaho 83352

Dear Mr. Cowley:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Draft Environmental Impact Statement (DEIS) for the Monument Resource Management Plan in Southcentral Idaho. This plan provides a comprehensive framework for managing 1,178,989 acres of Bureau of Land Management (BLM) administered public land for the next 15 to 20 years.

- 24-1 Alternative C, the preferred alternative, favors a balanced approach to commercial, recreational and wildlife uses of BLM administered land. Under this alternative estimated soil losses would increase by eight percent over current conditions (page 4-39). This impact should be discussed in more detail in the Final EIS. Existing water quality conditions should be described in the portions of the Snake River basin affected by the plan. What are the water quality ramifications of these soil losses to local streams, lakes and impoundments? Are there highly erosive areas that should be avoided or managed to protect water quality? Are there best management practices that can be utilized to mitigate soil losses and/or water quality impacts?
- 24-2

Based on our review, we have rated this DEIS LO-1 [LO: Lack of Objections; 1: Adequate Information] in accordance with our responsibility under Section 309 of the Clean Air Act to determine whether the environmental impacts of proposed major Federal actions are acceptable in terms of public health, welfare and environmental quality.

We appreciate the opportunity to review this report. Should you want to discuss EPA's comments, please contact Richard R. Thiel, Environmental Evaluation Branch Chief, at (206) 442-1728 or FTS 399-1728.

Sincerely,

*Robert S. Burd*  
Robert S. Burd  
Director, Water Division

Response to Letter Number 24

- 24-1 The soils discussions have been expanded in the final EIS.
- 24-2 The impacts on water quality of the Snake River Basin from actions proposed in this plan would be negligible. Areas of possible sedimentation occur along the Little Wood and Snake rivers. Map 1 shows the extent of BLM-managed public lands along these rivers. Nine miles of streambank along the Little Wood River between Richfield and Carey have been fenced to exclude cattle from the only substantial riparian zone as explained on page 3-8 of the draft. ORV limitations or closures are proposed for the Cedar Fields and Devil's Corral areas along the Snake River. These restrictions would help mitigate minor sedimentation problems that may occur on these portions of the rivers.

Letter Number 25



United States Department of the Interior

NATIONAL PARK SERVICE

Pacific Northwest Region  
Weslin Building, Room 1920  
2001 Sixth Avenue  
Seattle, Washington 98121

IN REPLY REFER TO:

L7619(PNR-RE)  
DES 84/27

August 3, 1984

Mr. Ervin Cowley, Project Manager  
Bureau of Land Management  
Shoshone District  
P.O. Box 28  
Shoshone, Idaho 83352

Dear Mr. Cowley:

We have reviewed the draft Monument Resource Management Plan/Environmental Impact Statement (RMP/EIS) and have the following comments:

Cultural Resources

The discussion of cultural resources in the RMP/DEIS is brief, general, and dispersed-making it difficult to evaluate. But, it indicates a commitment by BLM to protect cultural resources from various multi-use impacts projected for the 1,178,989 acre Plan area in southern Idaho.

We are deeply concerned that the preferred alternative would leave 92 percent of the Plan area open to ORV use. All too often this type of activity coincides with locations of prehistoric and historic living/use areas and trails, rapidly destroying the evidence for them by direct attrition or consequent erosion. At the proposed level, we do not see how the identification, evaluation, and protection of significant cultural resources owned or controlled by the Government can keep pace with their damage and destruction by ORVs and resulting public access.

- 25-1 While it is true that most of the 200 cultural resources with the Plan area have been found along the Snake River and its major tributaries, this is where the greatest number of archeological surveys by far have been carried out in connection with dam building over the years. The Final RMP/EIS should point this out, and the fact that the lack of surveys in the interior of the Plan area would result in fewer sites even if the site density were the same as along the Snake. The cultural resources in the interior also differ in type (as discussed on pages 3-26 and 27) with fewer indications of long-term habitation or reuse of site locations.

25-2 While the single cultural resource map (No. 8) for the DEIS "Cultural Resources, Areas of Geologic Interest, and Isolated Tracts" may accurately portray the location of high density cultural resources along the Snake, it is apt to mislead managers and the public. It should be modified so as not to leave the impression that important resources within the Plan area occur only in zones of high site density and that the land inbetween is free of sites or any of importance. It should be redrawn, or another map produced, to convey a more balanced picture of the known distribution of resource classes and surveys.

25-3 While interior cultural resources are often less well represented by finished, diagnostic artifacts, as a class they are important because of their scarcity and our present lack of information on their relationship to riverine sites in terms of culture, chronology, and seasonal movements of people. The Plan should state clearly that in many cases surveys will be required in advance of potentially destructive undertakings within the interior. These resources, along with those along the Snake River and major tributaries, will require careful evaluations of significance and eligibility to the National Register of Historic Places.

25-4 The Final RMP/EIS should state that prior to the undertaking the comments of the Advisory Council on Historic Preservation will be obtained when the State Historic Preservation Officer concludes that eligible properties will be adversely affected by a Federal or Federally permitted undertaking. The above steps are required by sections 106 and 110 of the National Historic Preservation Act of 1966 (as amended to 1980), the procedures for which are detailed in 36 CFR 800. These particular legal references were omitted from the list in Appendix H "Cultural Resource: Standard Operating Procedure" and should be added.

25-5 It will be important for the Shoshone District BLM to proceed with development of the specific activity plans for cultural resources in areas under its ownership, control, or management. We recommend that the Final RMP/EIS outline how cultural resources will be dealt with and managed in connection with each specific activity or issue listed in the BLM preferred alternative. Particularly relevant issues are Off-Road Vehicles, Recreation Wilderness Study Areas, Land Retention or Disposal, Livestock Grazing, and Mineral and Roadbed Material Lease Land. The scope and content of cultural resource management plans to be developed for particular management areas of the BLM should also be outlined in the Final RMP/EIS.

The followup management plans should be coordinated closely with long range Statewide survey and planning priorities of the Idaho State Historic Preservation Office, Boise (Merle Wells, State Historic Preservation Officer; Thomas Green, State Archeologist). The BLM priorities for archeological and historical needs within the Monument Resource Management Plan area should be defined in concert with study areas, topics, and strategies actively being developed by the SHPO in conjunction with the Resource Protection Planning Process (RP3) developed by the National Park Service for use by the States.

### Impacts on the National Park System

It appears that no existing or proposed units of the National Park System will be affected either directly or indirectly by the proposed action.

Thank you for the opportunity to provide these comments.

Sincerely,

*Frederick J. Bender*  
Frederick J. Bender  
Acting Associate Regional Director  
Recreation Resources and  
Professional Services

Letter Number 26

Response to Letter Number 25

1800 Hatcher  
Ann Arbor, Michigan 48103  
August 4, 1984

25-1 Upland areas lack water and sufficient vegetation variety to support the same population density (site density) as those areas along water courses. More recent studies in the Minidoka area (Druss and Druss 1984) indicate a site density of 3.6 sites per section, whereas a previous study by Butler (1982) examined a narrow corridor along the banks of the Snake River approximately eight miles long from Bliss Dam to the King Hill Bridge on I-84 and recorded 69 prehistoric sites; a site density of 44 sites per section. Although no formal sampling studies have been conducted in the lava fields north of the Minidoka study area, experience with this area would lead one to suggest that site density would drop far below the 3.6 sites per section in the Minidoka area where soils are better developed and water more frequent.

25-2 Significance of the resources contained within the areas of high density and low density is the same, dependent upon the content and condition of the resource.

25-3 This is stated in Appendix H of the draft and final EIS.

25-4 Appendix H has been expanded to clarify our position that if our initiated actions will affect a significant property, the project would be abandoned. Eligible properties will not be adversely affected by our actions.

25-5 Our standard operating procedures in Appendix H will ensure compliance with our authorized activities. The details of cultural resource management plans will be worked out at the time of activity plan preparation.

Mr. Ervin Cowley  
Project Manager  
Bureau of Land Management  
P.O. Box 28  
Shoshone, Idaho 83352

Dear Mr. Cowley:

I would like to comment on the Draft Monument Resource Management Plan and Environmental Impact Statement of April, 1984.

I strongly support Alternative D, as opposed to Alternatives A-C. The other alternatives are unacceptable based on a number of factors, all of which represent excess emphasis on consumptive and non-renewable uses versus long-term renewable uses and protection of the resource base. These include excess amounts of area open to ORV use, a projected large proportion of decreasing or continued fair-to-poor vegetation quality due to livestock grazing, a minimal amount of wilderness protection, and the projected low levels of soil productivity and high levels of erosion that would result from implementation of these alternatives. Since Alternatives A and B are both more consumption oriented than either Alternative D or Alternative C (the BLM Preferred Alternative) in virtually all categories my comments on Alternative C can also be construed to apply to A and B, but to an even greater extent.

With regard to wilderness, Alternative C would designate only two of the six Wilderness Study Areas as wilderness. This represents only 87,902 out of 154,019 acres where existing wilderness values would be protected. The draft RMP notes on page 2-72 that on the 66,113 non-wilderness acres, "projected increases in ORV use could begin to affect wilderness character significantly in the long term". This is an extremely conservative statement--there is no doubt that, should ORV's be allowed in the non-recommended WSAs, there would be irreversible and irretrievable damage to wilderness values in those areas in the long term.

The sacrifice of such scenic, ecological and recreational resources, though tragic, could theoretically be justified by other conflicting needs of overriding importance. The draft RMP notes, however, that with adoption of Alternative D there would be no significant negative effects on fire management, wildlife, lands, wilderness, natural history, cultural resources, recreation (except motorized), soils or minerals. The growth of total annual income would be somewhat slower than in Alternative C, but still higher than under present management. Thus, the major factors used to justify non-designation for the four non-recommended WSAs appear to be ORV use and livestock forage.

Livestock grazing is, when carefully monitored and regulated, a useful and productive utilization of range land. However, the question is how much grazing is able to be practically accommodated in the resource area. Judging from the figures on page 2-68, Alternative D would reduce the number of AUM's to a level